

Water Quality and System Safety

Marine and Pipeline Operations:

The DEIR discusses the risk of accidental oil spills from loading and unloading operations and collisions, as well as from pipeline ruptures. The DEIR should undertake a more extensive analysis of “upset” and response scenarios, including a description of San Francisco Bay’s vessel traffic control systems and an overview of existing response systems in practice, past effectiveness, and current capabilities. Additionally, Water Transit Authority (WTA) plans for expanded ferry service should be considered as should the increasing use of supertankers, double-hulled vessels, and expanded cruise ship traffic.

39-5

The DEIR should provide a more detailed discussion of ballast water discharge, on-board or on-shore treatment and potential water quality and invasive species impacts (including hull bottom-related).

39-6

We concur with the document’s conclusions about potentially significant unmitigated impacts from oil spills under certain conditions. While additional mitigation may not eliminate such impacts, certain mitigation strategies may further minimize impacts. These include additional oil spill prevention and response training, enhanced interagency coordination (USCG, Chevron, SLC, BCDC, etc.), additional BMPs (i.e. positioning of response equipment, navigational procedures, use of escort vessels, off- and on-loading restrictions during bad weather, etc.), and development of an oiled seabird recovery program. These and other measures should be evaluated in the EIR.

39-7

Stormwater:

CEQA requires the EIR to address potential impacts of construction, as well as, operational stormwater discharges. Please revise the document accordingly.

39-8

Air Quality

The EIR should address “electrification” as a means to reduce particulate (PM10) emissions.

39-9

Socioeconomic Impacts

SLC regulations also require review of socioeconomic impacts of the proposal. The DEIR provides only a cursory discussion, at most, of potential socioeconomic project impacts and does not include any analysis of cumulative socioeconomic impacts (i.e., socioeconomic impacts associated with the project together with the operation of the Chevron refinery). Socioeconomic impacts should include an analysis of public services and facilities impacts and associated costs, as well as potential positive effects related to employment generation, property taxes, etc. This evaluation would be best accomplished via a benefit/cost analysis.

39-10